

## **REMARKS**

Claims 1-13 and 34-41 are pending in the application. The Applicants note the allowance of Claims 1-13. The Applicants have amended the claims to address minor typographical issues. No new matter has been added by these amendments.

### **Rejection of Claims 39 and 41 under Section 112**

The Examiner has rejected claims 39 and 41 as indefinite for their recitation of MEGACO-compliant media gateways. The Examiner contends that the specification merely recited MEGACO on page 29, line 4 without further explanation. However, the applicants sufficiently described MEGACO on page 28 of the specification at lines 11-15:

More specifically, each communications card **24** appears as a MEGACO-compliant (*See* Cuervo et al., "*Megaco Protocol*," Internet Draft <draft-ietf-megaco-protocol-06.txt, Feb. 8, 2000, incorporated herein by reference) Media Gateway ("MG"), and the IP device control element **31** on the external IP signaling network **29** is a MEGACO-compliant Media Gateway Controller ("MGC").

Applicants therefore respectfully request that the Examiner withdraw the Section 112 rejections of claims 39 and 41.

### **Rejection of Claims 34-41 under Section 102(e)**

The Examiner has rejected Claims 34-41 under section 102(e) as being anticipated by Goss (U.S. Patent No. 6,493,447). The Applicants respectfully suggest that the Examiner has misapplied the Goss reference, and that the claims are allowable over Goss.

In the Goss reference, the Examiner appears to equate the phone and the PC as the first and second network subdevices, respectively, of the pending claims in an attempt to have Goss read on the claims. However, the Examiner's assessment is inconsistent with Goss' teachings,


which do not describe the claimed invention. In Goss, the phone (first subdevice) is on one network, and the PC (second subdevice) is on a second network, but not also on the first network, as required by the claims. In the present invention, the second network subdevice is on both the first and second networks. Moreover, the citation to col. 11, lines 5-37 of the Goss reference fails to identify any address allocation functions as claimed in the present invention. Goss also fails to teach that: (1) the first network subdevice further comprises an IP interface and the client of the the first network subdevice is a Realm Specific Internet Protocol host as specified in Claim 34; (2) the second network subdevice further comprises an IP interface and the network address server of the second network subdevice is a Realm Specific Internet Protocol gateway as specified in Claim 35; or the first network subdevice further comprises a data application and a device control application as specified in Claim 36. IN fact, Goss fails to address Realm Specific Internet Protocol whatsoever.

Applicants therefore respectfully contend that the Goss reference is inapplicable, and Claims 34-36 are allowable. Claims 37-41 depend from Claims 34-36, and the Examiner's rejection of Claims 37-41 was based on his rejection of Claims 34-36; thus these claims are also allowable.

Applicants believe all claims continue to be in condition for allowance.

Respectfully submitted,  
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